

1 Peter R. Afrasiabi (Bar No. 193336)  
pafrasiabi@onellp.com  
2 **ONE LLP**  
3 23 Corporate Plaza, Suite 150-105  
Newport Beach, CA 92660  
Telephone: (949) 502-2870  
4 Facsimile: (949) 258-5081

5 | *Attorneys for Plaintiffs,  
Joanna Ardalan, Esq. and One LLP*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

10 JOANNA ARDALAN, ESQ, an individual; ONE LLP, a California Limited Liability Partnership,

Plaintiff,  
v.

13 BINOTECH LLC.; KAREN  
14 MUMMERT; MICHAEL MUMMERT;  
15 ABDULLAH LIMITED COMPANY,  
16 CODERS CUBE LLC, HIK TECH  
17 LLC, DATA PATCH, INC., DOE 1,  
18 d.b.a LAW INTEGRAL, LLC, business  
entity unknown; DOE 2, d.b.a DEPUTY  
19 TRADEMARK. business entity  
20 unknown; DOE 3, p.k.a MICHELLE  
SPRAGUE, an individual; DOE 4, d.b.a  
TRADEMARK INTEGRAL, business  
entity unknown; DOE 5, d.b.a  
BRANDREGISTRATION.ORG,  
business entity unknown; and DOES 6  
through 10, inclusive,

21 Defendants.

Case No. 8:23-cv-01243-KK-(DFMx)  
Hon. Kenly Kiya Kato

**EX PARTE APPLICATION FOR  
AN ORDER GRANTING EARLY  
DISCOVERY TO SERVE  
SUBPOENA ON JP MORGAN  
CHASE BANK AND COMMUNITY  
FEDERAL SAVINGS BANK**

**[DECLARATION OF JOANNA  
ARDALAN AND PROPOSED  
ORDER FILED CONCURRENTLY  
HEREWITH]**

1     **I. INTRODUCTION AND STATEMENT OF FACTS**

2                 Plaintiffs Joanna Ardalan and One LLP respectfully request that they be  
3 permitted to conduct early discovery on the identity of the Defendants who  
4 registered and operate the websites that are at issue in this case, lawintegral.com,  
5 brandregistration.org, trademarkintegral.com, and deputytrademark.com, through JP  
6 Morgan Chase Bank and Community Federal Savings Bank. Plaintiffs are now  
7 informed that Defendants, specifically Defendant Doe 1, Law Integral, LLC and  
8 Defendant Doe 2, Deputy Trademark, received money from their victims through at  
9 least two bank accounts, one at JP Morgan Chase, and other at Community Federal  
10 Savings Bank.

11                 Defendants have defrauded an unknown number of victims who paid for  
12 trademark legal services believing that they had hired Plaintiff Joanna Ardalan to  
13 perform those services. While Defendants used Ms. Ardalan's name in  
14 correspondence with their "clients," Defendants had no association with Ms.  
15 Ardalan or One LLP.

16                 Plaintiffs previously requested that they be permitted to issue subpoenas on  
17 various entities to assist them in determining the identity of the Defendants. The  
18 Court granted that request on December 13, 2023. (Dkt. 24) Plaintiffs then  
19 conducted discovery that was fruitful and Plaintiffs were able to amend their  
20 complaint to name additional parties. *See* First Amended Complaint. However,  
21 Plaintiffs believe additional parties are involved.

22                 On September 9, 2024, another small business owner "client" of Defendant  
23 Deputy Trademark and Defendant Law Integral, Jarrod Cruzat, emailed Plaintiff  
24 Joanna Ardalan at her One LLP email address. Ardalan Decl. Ex. A (showing Law  
25 Integral providing legal services), *see* Ex. H (showing Deputy Trademark providing  
26 legal services). He believed that Joanna Ardalan from One LLP was the "Joanna  
27 Ardalan" identified in Defendants' operations. He was concerned by "Joanna  
28 Ardalan's" lack of response to his emails and the fees he had paid Deputy

1 Trademark and Law Integral. This was the first time Plaintiff Joanna Ardalan ever  
2 received a communication from this victim. Ardalan Decl. ¶ 1. On or around  
3 September 10, 2024, Mr. Cruzat provided Plaintiffs with the bank account  
4 information that he had used to wire over \$30,000 to Defendants, while believing  
5 he was working with “Joanna Ardalan.”<sup>1</sup> Ardalan Decl. Ex. A. (“I’ve paid \$30,000  
6 to deputy trademarks not accounting for taxes and legal fees to Integral Law  
7 outlined by you below. They now are requesting 30% of the petition to cancel fee  
8 that they paid without my consent. I need written confirmation that you will not be  
9 requesting the other 70% as deputy trademarks has stated on your behalf.”) Law  
10 Integral/Deputy Trademark remarkably charged this small business owner for fees  
11 that do not exist within the USPTO fee structure, such as an Attestation and  
12 Submission of Documents with the IRS and DOJ, at a cost of \$2,349 per application  
13 (they submitted two applications), submissions for “specimens per class” of \$299  
14 per class (there were three classes in each of the two applications), affidavit of  
15 guarantee per class (at a cost of \$399 per class), and also charged an attorney  
16 processing fee of \$399 per application. *Id.* Of course, as they were impersonating  
17 Joanna Ardalan, there was no attorney “processing” the application. Defendants  
18 issued fake trademark registration certificates (Ardalan Decl., Exhibit B) and then  
19 on or around September 3, 2024 *served a fake* a cease and desist letter from another  
20 of their entities, Brand Legal Services, claiming an unnamed client had priority  
21 over Defendants’ trademark because it had used the mark since April 20, 2022.<sup>2</sup>  
22 (Ardalan Decl. Ex. C.) Brand Legal Services attached two screenshots, one of the  
23 USPTO database and another of the Canadian Trademarks Database that made it  
24

25 \_\_\_\_\_  
26 <sup>1</sup> Mr. Cruzat received emails both from email addresses with the domain names  
lawintegral.com and deputytrademark.com. See Ardalan Decl. Ex. A, H.

27 <sup>2</sup> This is not the first time Defendants used “Brand Legal Services” to issue cease  
and desist letters to drive up “legal fees” on behalf of its clients. Another victim also  
disclosed that “Brand Legal Services” issued an cease and desist letter and even  
forwarded correspondence between Defendant posing as Joanna Ardalan and Brand  
Legal Service regarding a made up trademark dispute.

1 appear as though “Pacific Acquisition” was a pending application. Ardalan Decl. D,  
2 E. These screenshots were not real. Ardalan Decl. ¶ 4. After the cease and desist was  
3 issued, Law Integral/Deputy Trademark demanded “30%” of an additional fee to file  
4 a “petition to cancel” the trademark registrations that the victim had just paid to  
5 secure. Ardalan Decl. Ex. A (“They now are requesting 30% of the petition to  
6 cancel fee that they paid without my consent. I need written confirmation that you  
7 will not be requesting the other 70% as deputy trademarks has stated on your  
8 behalf.”)

9 Plaintiffs respectfully request permission to issue subpoenas to JP Morgan  
10 Chase Bank and Community Federal Savings Bank so that Plaintiffs may discover  
11 where the money paid to these accounts are going and to the extent there are  
12 additional victims who wired money through this account, Plaintiffs would like to  
13 give notice to the new victims that Joanna Ardalan and One LLP have no  
14 association with Defendants. This discovery is especially important as three of the  
15 entities who have been added to the lawsuit in the First Amended Complaint have  
16 defaulted, thus denying Plaintiffs the opportunity to do further discovery on them to  
17 find others involved in this scheme to defraud small business owners.

18 **II. PLAINTIFFS’ REQUEST FOR DISCOVERY**

19 Plaintiffs Joanna Ardalan and One LLP respectfully request that the Court  
20 permit discovery on JP Morgan Chase, N.A., and Community Federal Savings Bank  
21 regarding any bank accounts in which Defendants are the beneficiaries, as well as  
22 the two accounts specifically identified by Mr. Cruzat, to which he wired money.  
23 Ardalan Decl. Ex. F, G, H. In addition, Plaintiffs seek discovery on information that  
24 may assist identifying the persons controlling the account as well as any potential  
25 victims who may not know they have been defrauded or are in the process of being  
26 defrauded for additional funds.

27 **III. CONCLUSION**

28 Plaintiffs respectfully request that this ex parte application be granted in full.

1

2 Dated: October 29, 2024

**ONE LLP**

3

4

By: /s/ Peter R. Afrasiabi

Peter R. Afrasiabi

5

6

*Attorneys for Plaintiff,*

Joanna Ardalan, Esq. and One LLP

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28